

Lance J.M. Steinhart, P.C.

1720 Windward Concourse

Suite 115

Alpharetta, Georgia 30005



0000107154

ORIGINAL

Also Admitted in New York
and Maryland

Telephone:(770) 232-9200

Facsimile:(770) 232-9208

Email: lsteinhart@telecomcounsel.com

January 25, 2010

VIA OVERNIGHT DELIVERY

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007
(602) 542-2237

Arizona Corporation Commission

DOCKETED

FEB - 4 2010

DOCKETED BY	
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AZ CORP COMMISSION
DOCKET CONTROL

2010 FEB - 4 1 P 4: 39

RECEIVED

Re: 321 Communications, Inc.
Docket No. T-20696A-09-0394

Dear Sir/Madam:

Enclosed please find for filing an original and thirteen (13) copies of 321 Communications, Inc.'s responses to the Commission's request for information in 321 Communications, Inc.'s Application and Petition for Certificate of Public Convenience and Necessity to Provide Resold and Facilities-Based Local Exchange Telecommunications Service.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me.

Respectfully submitted,

Lance J.M. Steinhart
Attorney for 321 Communications, Inc.

cc: Lenny Solt

Michael W. Patten, Esq. (facilities based only - via 2-Day Delivery)

Lori Morrison, Staff Attorney, Utilities Division - Via email -
lmorrison@azcc.gov@cc.state.az.us

**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.1 Please provide the name of each key personnel employed by the Company, to include but not limited to, name, title, position, description of their work experience and the years of service in the telecommunications industry.

RESPONSE:

Leonard Solt	Secretary/Treasurer
Christopher S. Watson	President
Jjkareem Jones	Vice-President

Please see the attached biographical information.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

Lenny Solt

Mr. Solt is the CFO and Co-Founder of 321 Communications. 321 Communications is a CLEC. 321 Communications provides Termination and Origination Telecommunication Services across the continental US. Mr Solt duties range from finance, revenue projections, sales and vendor relationships and regulatory compliance.

Prior to Co Founding 321 Communications Mr. Solt was the National Sales Manager for a Direct Sales Organizations. He was responsible for all aspects of sales and marketing. Under his leadership the company was exponential growth. He was responsible for an organization that produced in excess of \$11 million in sales annually.

In addition to developing sales organizations Mr. Solt created, directed and coordinated Advanced Sales Seminars, and a National Advertising Campaigns. He is considered an expert at Trade Show Marketing and Sales Development

Currently in addition to 321 Communications Mr. Solt is a Managing Partner of one of the nation's fastest growing CLEC's. Lifeconnex formerly Swiftel, LLC has grown to 40,000 customers strong in just over 2 ½ years. Mr. Solt is involved in all aspects of this business from finance, sales to working with 3rd party vendors regarding regulatory and taxation compliance.

In addition to his Telecommunication experience Mr. Solt is the President and CEO of a Multi- Million Dollar Paint Contracting Company located in Tampa Florida..

Mr. Solt is College educated and has in excess of 20 years of experience as a small business owner..

Chris Watson

1988-1990 University of Connecticut- Storrs Ct
Business/Economics

1991-1994 Oral Roberts University- Tulsa Ok
Advertising Public Relations

1994 -1996 Auto Trader Sales Executive

1996 started Teleconex, Inc
Vice President-

Teleconex was a local phone provider in South Eastern United States. Chris served as the V.P of Operations and built the company to 20,000 subscribers and sold the company in 2003. The company had revenues of 12 million a year!

2003 - Lost Key Telecom, Inc.
Vice President-

LKT was started by Chris in 2003 and is presently serving 60 plus local phone service providers across the United States. LKT focuses on least cost provisioning and revenue assurance.

www.lostkeytelecom.com

2007- 321 Communications, Inc.
Managing Partner

321 is a provider of termination, origination and DID service across the domestic United States.

www.321communications.com

2008 True Wireless, LLC just started company a few weeks ago.

The Principles

Jay Jones

Co-Founded 321Communications and operates as the Executive Vice President.

Prior to co-founding 321 Communications, Jones spent over thirteen years in the telecom industry. Jones has held a number of engineering, management and executive management positions with leading Telecommunication companies such as Qwest Communications, US West Communications, New South Communications, Telefyne Inc, DCI Voice and the US Army.

Jones has over a decade of hands on development and management expertise in both TDM and VOIP telecommunications as well as software development. Jones is a subject matter expert in Local Area Networks, Wide Area Networks, Voice over IP (VoIP) Networks, Implementation of routing protocols, telecom switching equipment, In-depth experience of Cisco systems, Compliance with telephony installations and quality standards

Jones also holds major certifications in Cisco engineering, Microsoft network engineering and Microsoft software development. Jones is also a co-founder of uNAvo, Inc , a telecom software company based out of Jacksonville FL that specializes in creating software solutions and providing telecom consulting services for telecom companies.

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- STF 1.2 Will the Company be providing Long Distance Services or Toll Services in Arizona?
- A. If so, please explain when that will occur.
 - B. If not, please remove any and all references to Long Distance or Toll Services in proposed Arizona Tariff No. 2, including and not limited to pages 1, 52, 105, 109, 110, 111, 112.
 - C. If the Company is not offering Long Distance Services or Toll Services in Arizona, are the ISDN-PRI packages set forth on pages 109-112 in error? If so, please remove these service offerings from this tariff.

RESPONSE:

Please see the attached revised Pages 1, 52, 70, 73, 105, 109, 110, 111 and 112.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
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Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

Arizona
LOCAL EXCHANGE TELECOMMUNICATIONS SERVICES TARIFF
OF
321 Communications, Inc.

This tariff contains the descriptions, regulations, and rates applicable to the provision of local exchange telecommunications services provided by 321 Communications, Inc. with principal offices at 24814 State Road 54, Lutz, Florida 33549 for services furnished within the State of Arizona. This tariff is on file with the Arizona Corporation Commission, and copies may be inspected, during normal business hours, at the Company's principal place of business.

Issued: August 13, 2009
Issued by:

Leonard Solt
Treasurer
24814 State Road 54
Lutz, Florida 33549

Effective: September 13, 2009

SECTION 4.0 - BASIC SERVICES AND RATES, (CONT'D.)**4.3 Network Exchange Bundled Service****4.3.1 General**

321 offers basic local exchange service only as part of a bundle or package of telecommunications services. All packages include local service and selected custom calling features. Voice Mail and Optional Internet access 1 may be available with some packages at an additional charge. The aforementioned services are only available as part of the bundled service offering and are not available on an individual service basis. Customers will be billed directly by the Company.

The Company provides Customers with the option of obtaining a Primary Line and Secondary Line per account:

A. Primary Line

The initial residential local exchange access line per account.

B. Secondary Line

The second or additional residential local exchange access line, billed to the same address as the Primary Line, the Secondary Line will share the monthly call allowance with the Primary Line. The Secondary Line does not automatically include or share any Custom Calling Features. Feature packages may be purchased separately.

Should a Customer with both lines opt to disconnect the Primary Line, the remaining Secondary Line will automatically convert to a Primary Line with all features and functionality of such, and at the Primary Line monthly recurring rate.

SECTION 4.0 - BASIC SERVICES AND RATES, (CONT'D.)**4.3 Network Exchange Bundled Service, (Cont'd.)****4.3.6 Arizona Business Edition - Standard Service**

Business Edition - Standard is a package of features available to business customers in conjunction with an individual flat rate or additional flat rate access line. Business customers subscribing to the package are entitled to choose three services/features from the following list in their package.

- Anonymous Call Rejection
- Caller ID - Name and Number
- Call Forwarding Busy Line
- Call Forwarding Busy Line/Don't Answer
- Call Forwarding Don't Answer
- Call Forwarding Variable
- Remote Access Forwarding
- Call Transfer
- Call Waiting
- Call Waiting ID
- Selective Call Waiting
- Custom Ringing
- Directory Assistance (6 calls above allowance)
- Last Call Return
- Message Waiting Indication – Audible or Audible/Visual
- Three-Way Calling

Terms and Conditions

- a. All terms and conditions specified elsewhere for the respective services/features requested as part of this package shall apply.
- b. A customer choosing Caller ID - Name and Number will automatically be provided with Anonymous Call Rejection.
- c. A customer may choose one or more compatible features in the Call Forwarding Family as one of their selections.
- d. A customer may choose Call Waiting, Call Waiting ID or Selective Call Waiting from the Call Waiting Family as one of their selections.

SECTION 4.0 - BASIC SERVICES AND RATES, (CONT'D.)**4.3 Network Exchange Bundled Service, (Cont'd.)****4.3.7 Arizona Business Edition - Deluxe Service, (Cont'd)****Terms and Conditions, (Cont'd.)**

- d. A customer may choose Call Waiting, Call Waiting ID or Selective Call Waiting from the Call Waiting Family as one of their selections.
- e. A customer who chooses Voice Messaging Service will also be provided with Call Forwarding Busy Line/Don't Answer, Easy Access and Message Waiting Indication as part of their Voice Messaging Service selection. A customer who wishes to use another provider's Voice Messaging Service will be provided with Call Forwarding Busy Line/Don't Answer, Easy Access and Message Waiting Indication and it will not be counted as one of their three selections of features/services.
- f. All services or features selected in the package can only be provided where technically available and compatible with other features the customer may choose to order.
- g. Customers selecting Directory Assistance may make six calls above the allowance to the Company's 411 service.

Rates and Charges

- a. The monthly rate that follows includes a business individual flat rate or additional flat rate line as specified in 4.3.5A, preceding. Where applicable, incremental charges, apply.
- b. Normal nonrecurring charges associated with the line as specified in 4.3.5, preceding, apply where the Company's Business is provided in association with the installation of a new business individual or additional flat rate line or the move of a business individual or additional flat rate line from one location to another.
- c. Any mandated charges or special surcharges, e.g., 911, TDD, EUCL, Telephone Assistance Plan, will apply to Add-A-Line under the same terms as a flat rate business line.
- d. Arizona Business Edition - Deluxe will be provided at the following rate:

	MAXIMUM MONTHLY RATE
Per individual or additional flat rate business line	\$100.00

SECTION 6.0 - LONG DISTANCE SERVICES

6.1 Reserved for Future Use

Issued: August 13, 2009
Issued by:

Leonard Solt
Treasurer
24814 State Road 54
Lutz, Florida 33549

Effective: September 13, 2009

SECTION 7 – ADVANCED SERVICES**7.2 Advanced Service Packages, (Cont'd.)****7.2.3 ISDN PRI Service with Unlimited Local Calling**

ISDN PRI offers an array of value-added features, such as calling number identification and call-by-call selection that enhance productivity. ISDN PRI is configured with 23 64 Kbps bi-directional B (Bearer) channels and one 64 Kbps D (Data) channel. Unique to ISDN PRI is its ability to designate the D channel to handle all of the signaling and call control requirements and leave the remaining 23 B channels free for any mix of circuit-switched voice and data.

This product is offered under a 12, 24 or 36 month term agreement. Rates include unlimited local calling for sent-paid, directly dialed calls. Rates do not include calling card calls, information type calls to Time and Weather, 555, 700, 900, 976 Services, Directory Assistance or any other type of Operator Handled call.

The Unlimited Local Calling Products are offered with six different increments of Minutes of Use: 5,000, 10,000, 15,000, 30,000, 50,000 and 100,000. Installation charges are included in the monthly recurring charges.

ISDN PRI with Unlimited Local

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number & Call-by-Call Selection.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
ICB	ICB	ICB

ISDN PRI with Unlimited Local

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number & Call-by-Call Selection.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
ICB	ICB	ICB

SECTION 7 – ADVANCED SERVICES**7.2 Advanced Service Packages, (Cont'd.)****7.2.3 ISDN PRI Service with Unlimited Local Calling (Cont'd.)****ISDN PRI with Unlimited Local MOU**

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number & Call-by-Call Selection.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
ICB	ICB	ICB

ISDN PRI with Unlimited Local MOU

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number & Call-by-Call Selection.

SBC/Pacific Bell Area	Monthly Recurring Charge		
	12 Months	24 Months	36 Months
	ICB	ICB	ICB

ISDN PRI with Unlimited Local MOU

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number & Call-by-Call Selection.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
ICB	ICB	ICB

ISDN PRI with Unlimited Local MOU

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number & Call-by-Call Selection.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
ICB	ICB	ICB

SECTION 7 – ADVANCED SERVICES**7.2 Advanced Service Packages, (Cont'd.)****7.2.4 Digital DS-1 PBX Service with Unlimited Local Calling Service**

This service provides a trunk side DS1 electrical interface from the customer's digital PBX system to a digital port on a local Company switch for the origination and termination of calls. Traffic to and from the digital PBX can be received or dialed directly from any PBX station without the need for an attendant.

These digital trunks deliver a high-speed DS1 (T1) connection between your PBX and the Company network. There are up to 24 channels on one facility, each of which can be used to place or receive calls. This multi-channel capability dramatically reduces the need for additional PBX circuit cards.

Each of these products is offered under a 12, 24 or 36 month term agreement. Rates include unlimited local calling for sent-paid, directly dialed calls. Rates do not include calling card calls, information type calls to Time and Weather, 555, 700, 900, 976 Services, Directory Assistance or any other type of Operator Handled call.

The Digital DS-1 PBX Service with Unlimited Local Calling Service Products are offered with six different increments of Minutes of Use: 5,000, 10,000, 15,000, 30,000, 50,000 and 100,000. Installation charges are included in the monthly recurring charges.

ISDN DS1 with Unlimited Local MOU

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
ICB	ICB	ICB

ISDN DS1 with Unlimited Local MOU

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
ICB	ICB	ICB

Issued: August 13, 2009

Issued by:

Leonard Solt
Treasurer
24814 State Road 54
Lutz, Florida 33549

Effective: September 13, 2009

SECTION 7 – ADVANCED SERVICES**7.2 Advanced Service Packages, (Cont'd.)****7.2.4 Digital DS-1 PBX Service with Unlimited Local Calling and Bundled Toll/LD Service, (Cont'd.)**ISDN DS1 with Unlimited Local MOU

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
ICB	ICB	ICB

ISDN DS1 with Unlimited Local MOU

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
ICB	ICB	ICB

ISDN DS1 with Unlimited Local MOU

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
ICB	ICB	ICB

ISDN DS1 with Unlimited Local MOU

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
ICB	ICB	ICB

**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.3 Referencing the proposed Arizona Tariff No. 2, Original Page 7, the definition for **Account** only discusses residential services. However, the Company is also proposing to offer business services as well. Moreover, the information contained in the definition of Account seems more of a term/condition for residential service rather than a general description of an account. Please provide a more broad definition for Account that would include all types of accounts for local exchange service, regardless if the service selected is residential or business.

RESPONSE:

Please see the attached revised Page 7 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

SECTION 1.0 – DEFINITIONS

Access Line - An arrangement from a local exchange telephone company or other common carrier, using either dedicated or switched access, which connects a Customer's location to Carrier's location or switching center.

Account - A Company accounting category containing up to two (2) residential or business local exchange access lines billed to the same Customer at the same address. The second or non-primary local exchange access line will share any call allowance of the primary local exchange access line. The second or non-primary local exchange access line therefore will not be provisioned to include a separate call allowance structure. No features are included with the second or non-primary local exchange access line.

Account Codes - Permits Centrex Stations and attendants to dial an account code number of up to eight digits. For use when placing calls over facilities arranged for Automatic Message Accounting (AMA) recording. The account or project number must be input prior to dialing the called number.

Advance Payment - Part or all of a payment required before the start of service.

Authorization Code - A numerical code, one or more of which may be assigned to a Customer, to enable Carrier to identify the origin of service of the Customer so it may rate and bill the call. All authorization codes shall be the sole property of Carrier and no Customer shall have any property or other right or interest in the use of any particular authorization code. Automatic numbering identification (ANI) may be used as or in connection with the authorization code.

Authorized User - A person, firm or corporation authorized by the Customer to be an end-user of the service of the Customer.

Automatic Numbering Identification (ANI) - A type of signaling provided by a local exchange telephone company which automatically identifies the local exchange line from which a call originates.

Commission - Arizona Corporation Commission.

Common Carrier - An authorized company or entity providing telecommunications services to the public

Company - 321 Communications, Inc., the issuer of this tariff.

Customer - The person, firm or corporation that orders service and is responsible for the payment of charges and compliance with the terms and conditions of this tariff.

Customer Premises - A location designated by the Customer for the purposes of connecting to the Company's services.

Customer Terminal Equipment - Terminal equipment provided by the Customer.

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STF 1.4 Referencing the proposed Arizona Tariff No. 2, Original Page 8, the definition for **Equal Access** does not describe access to the customer's choice of toll provider but rather only discusses accessing the Company's network. Since this is the Definitions portion of the tariff, please provide a general definition for Equal Access that indicates that it allows the customer to access their toll carrier of choice directly without using a special code or dialing extra digits or use the definition found in A.C.C. §14-2-1102.18 for 2-PIC Toll Equal Access.

RESPONSE:

Please see the attached revised Page 8 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
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Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

SECTION 1.0 - DEFINITIONS, (CONT'D.)

Deposit - Refers to a cash or equivalent of cash security held as a guarantee for payment of the charges.

End Office - The LEC switching system office or serving wire center where Customer station loops are terminated for purposes of interconnection to each other and/or to trunks.

Equal Access - The equal access option that affords customers the opportunity to select one telecommunications company for all interLATA 1+/0+ toll calls and, at the customer's option, to select another telecommunications company for all intraLATA 1+/0+ toll calls.

Exchange Telephone Company or Telephone Company - Denotes any individual, partnership, association, joint-stock company, trust, or corporation authorized by the appropriate regulatory bodies to engage in providing public switched communication service throughout an exchange area, and between exchange areas within the LATA.

ICB - Individual Case Basis.

IXC or Interexchange Carrier - A long distance telecommunications services provider.

Interruption - The inability to complete calls due to equipment malfunctions or human errors. Interruption shall not include, and no allowance shall be given for service difficulties such as slow dial tone, circuits busy or other network and/or switching capability shortages. Nor shall Interruption include the failure of any service or facilities provided by a common carrier or other entity other than the Carrier. Any Interruption allowance provided within this Tariff by Carrier shall not apply where service is interrupted by the negligence or willful act of the Customer, or where the Carrier, pursuant to the terms of this Tariff, terminates service because of non-payment of bills, unlawful or improper use of the Carrier's facilities or service, or any other reason covered by this Tariff or by applicable law.

LATA - A Local Access and Transport Area established pursuant to the Modification of Final Judgment entered by the United States District Court for the District of Columbia in Civil Action No. 82-0192; or any other geographic area designated as a LATA in the National Exchange Carrier Association, Inc. Tariff F.C.C. No. 4, or its successor tariff(s).

LEC - Local Exchange Company refers to the dominant, monopoly local telephone company in the area also served by the Company.

**ARIZONA CORPORATION COMMISSION
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STF 1.5 Referencing the proposed Arizona Tariff No. 2, Original Page 10, the definition for **Switched Access Origination/Termination**, the second line states, "... and the connection to the Customer is a LED-provided business or residential access line." Please clarify what is meant by LED-provided in this context.

RESPONSE:

Please see the attached revised Page 10 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
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Lance J.M. Steinhart, Esq.
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SECTION 1.0 - DEFINITIONS, (CONT'D.)

Station - The network control signaling unit and any other equipment provided at the Customer's premises which enables the Customer to establish communications connections and to effect communications through such connections.

Subscriber - The person, firm, partnership, corporation, or other entity who orders telecommunications service from 321. Service may be ordered by, or on behalf of, those who own, lease or otherwise manage the pay telephone, PBX, or other switch vehicle from which an End User places a call utilizing the services of the Company.

Switched Access Origination/Termination - Where access between the Customer and the interexchange carrier is provided on local exchange company Feature Group circuits and the connection to the Customer is a LEC-provided business or residential access line. The cost of switched Feature Group access is billed to the interexchange carrier.

Terminal Equipment - Any telecommunications equipment other than the transmission or receiving equipment installed at a Company location.

Usage Charges - Charges for minutes or messages traversing over local exchange facilities.

User or End User - A Customer, Joint User, or any other person authorized by a Customer to use service provided under this tariff.

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STF 1.6 Referencing the proposed Arizona Tariff No. 2, Original Page 17, subsection 2.1.4.E, the tariff states, "The Company does not guarantee or make any warranty with respect to installations provided by it for use in an explosive atmosphere." Please explain what is meant by the term "explosive atmosphere" in this context.

RESPONSE:

In some industrial processes where flammable materials are handled, any leaks or spills may give rise to an explosive atmosphere.

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24814 State Road 54, Lutz, FL 33549
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Lance J.M. Steinhart, Esq.
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STF 1.7 Referencing the proposed Arizona Tariff No. 2, Original Page 30, subsection 2.5.1, the last sentence states, "Customers will only be charged once for any nonrecurring charges." Since this tariff is a local exchange tariff, when would there be a situation where a nonrecurring charge would be an interstate charge. Please give specific examples of situations where this might occur.

RESPONSE:

Please see attached revised Page 30 of Tariff No.2

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
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And

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E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

SECTION 2.0 - REGULATIONS, (CONT'D.)**2.5 Payment Arrangements****2.5.1 Payment for Service**

The Customer is responsible for the payment of all charges for facilities and services furnished by the Company to the Customer and to all Authorized Users by the Customer, regardless of whether those services are used by the Customer itself or are resold to or shared with other persons.

The Customer is responsible for payment of any sales, use, gross receipts, excise, access or other local, state, federal and 911 taxes, charges or surcharges (however designated) (excluding taxes on Company's net income) imposed on or based upon the provision, sale or use of Network Services.

The security of the Customer's PIN is the responsibility of the Customer. All calls placed using a PIN shall be billed to and shall be the obligation of the Customer. The Customer shall not be responsible for charges in connection with the unauthorized use of PINs arising after the Customer notifies the Company of the loss, theft, or other breach of security of such PINs.

Customers will only be charged once for any nonrecurring charges.

2.5.2 Billing and Collection of Charges

The Customer is responsible for payment of all charges incurred by the Customer or other Authorized Users for services and facilities furnished to the Customer by the Company.

- A. Nonrecurring charges are due and payable within thirty (30) days after the invoice date, unless otherwise agreed to in advance.
- B. The Company shall present invoices for recurring charges monthly to the Customer, in advance of the month in which service is provided, and Recurring Charges shall be due and payable within thirty (30) days after the invoice date. When billing is based on customer usage, charges will be billed monthly for the preceding billing periods.

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January 25, 2010**

- STF 1.8 Referencing the Arizona Tariff No. 2, Original Page 32:
- A Subsection 2.5.3.B, would the Company be willing to add the Commission's website address and its local and 800 telephone numbers to this portion of the tariff? If not, why not?
 - B. Subsection 2.5.3.C, if a billing dispute is resolved in favor of the Company and the customer has withheld the disputed amount, would any interest, credits or penalties apply?

RESPONSE:

- A. Please see the attached revised Page 32 of Tariff No.2.
- B. No charges would apply.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

SECTION 2.0 - REGULATIONS, (CONT'D.)**2.5 Payment Arrangements, (Cont'd.)****2.5.3 Disputed Bills**

- A. In the event that a billing dispute occurs concerning any charges billed to the Customer by the Company, the Company may require the Customer to pay the undisputed portion of the bill to avoid discontinuance of service for non-payment. The Customer must submit a documented claim for the disputed amount. The Customer will submit all documentation as may reasonably be required to support the claim. All claims must be submitted to the Company within 90 days of receipt of billing for those services. If the Customer does not submit a claim as stated above, the Customer waives all rights to filing a claim thereafter.
- B. Unless disputed the invoice shall be deemed to be correct and payable in full by the Customer. If the Customer is unable to resolve any dispute with the Company, then the Customer may file a complaint with the Arizona Corporation Commission, 1200 West Washington Street, Phoenix, Arizona 85007, Toll-Free (800) 222-7000, www.azcc.gov.
- C. If the dispute is resolved in favor of the Customer and the Customer has withheld the disputed amount, no interest, credits or penalties will apply.

2.5.4 Advance Payments

The Company does not collect advance payments.

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STF 1.9 Referencing the Arizona Tariff No. 2, Original Page 51, subsection 4.1 discusses call timing for usage sensitive service, i.e. minutes of use. Please identify each and every rate element contained in this tariff that is charged on a per-minute-of-use basis.

RESPONSE:

None, all rates are flat.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

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STF 1.10 Referencing the Arizona Tariff No. 2, Original Pages 58 and 60, there are two rates for what appears to be the same service. If the first listed rate is for the Primary Line and the second listed rate is for the Secondary Line, would the Company be willing to modify these two tariff sheets to clarify what rates go with a specific service? If not, why not?

RESPONSE:

Please see the attached revised Page 58 and 60 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

SECTION 4.0 - BASIC SERVICES AND RATES, (CONT'D.)**4.3 Network Exchange Bundled Service, (Cont'd.)****4.3.2 Arizona Home Edition - Standard Service, (Cont'd.)**

Rates

Arizona Home Edition will be provided at the following rates:

	MAXIMUM MONTHLY RATE
• Per individual flat rate residence line with three features – Primary Line	\$25.00
• Per additional flat rate residence line with three features - Secondary Line	30.00

SECTION 4.0 - BASIC SERVICES AND RATES, (CONT'D.)**4.3 Network Exchange Bundled Service, (Cont'd.)****4.3.3 Arizona Home Edition - Deluxe Service, (Cont'd.)**

Rates

Arizona Home Edition – Deluxe Service will be provided at the following rates:

	MAXIMUM MONTHLY RATE
• Per individual flat rate residence line with three features – Primary Line	\$40.00
• Per additional flat rate residence line with three features - Secondary Line	40.00

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STF 1.11 Referencing the Arizona Tariff No. 2, Original Page 62, there are maximum monthly rates listed for the Deluxe Service. However, on Original Page 60, there are maximum monthly rate listed for what appears to be the same service. Please clarify the difference in the two services and why they appear to be labeled the same with different maximum monthly rates.

RESPONSE:

Please see the attached revised Page 62 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

SECTION 4.0 - BASIC SERVICES AND RATES, (CONT'D.)

4.3 Network Exchange Bundled Service, (Cont'd.)

RESERVEED FOR FUTURE USE

Issued: August 13, 2009
Issued by:

Leonard Solt
Treasurer
24814 State Road 54
Lutz, Florida 33549

Effective: September 13, 2009

**ARIZONA CORPORATION COMMISSION
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STF 1.12 Referencing the Arizona Tariff No. 2, Original Page 62, there are maximum Service Connection Fees listed. Please clarify for which services these connection fees would apply. Specifically, would these fees be applied to Arizona Home Edition services (Standard or Deluxe) in general or would they be applied to only to customers requesting Deluxe Services? If the connection fees would apply to either service, would the Company be willing to have a separate section for the connection fees so there is no confusion about whether they only apply to Deluxe service given their presentation in the proposed tariff?

RESPONSE:

Please see the attached revised Page 62 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

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STF 1.13 Referencing the Arizona Tariff No. 2, Original Page 64, subsection 4.3.5, the second sentence states, "Customers who subscribe to this service must designate 321 as the presubscribed carrier for local calling concurrent with enrollment for service." Since the customer is placing an order for 321's local exchange service, won't the order be processed by as a 321 customer? Please explain in detail why the customer has to designate 321 as their local exchange carrier when they sign up with 321 for local exchange service.

RESPONSE:

Customers must sign a letter of agency which designates 321 as the local carrier as required by FCC Rules and Regulations.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

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STF 1.14 Referencing the Arizona Tariff No. 2, Original Page 64, referencing Footnote 1 on this page, please clarify if the service connection fee is waived for all lines (meaning more than one) who retain their existing telephone numbers when switching their service to 321.

RESPONSE:

Please see the attached revised Page 64 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

SECTION 4.0 - BASIC SERVICES AND RATES, (CONT'D.)**4.3 Network Exchange Bundled Service, (Cont'd.)****4.3.5 Business A La Carte Service**

Business A La Carte service is targeted at small business Customers and provides options based on the Customers calling patterns and estimated usage. . Customers who subscribe to this service must designate 321 as the presubscribed carrier for local calling concurrent with enrollment for this service.

A. Local Exchange Service**.1 Local Access Line**

	Maximum
Local Business Line	
Monthly Rate	\$120.00
Service Connection Fee, one-time charge per line ¹	
Per Line	\$200.00

.2 PBX

	Maximum
Monthly Rate	\$120.00
Service Connection Fee, one-time charge per line ¹	
Per Line	\$200.00

¹ Service Connection fee is waived for those customers who retain their existing telephone number when switching their service to 321. The charge will apply if additional lines are transferred to 321 after the initial order.

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STF 1.15 Referencing the Arizona Tariff No. 2, Original Page 74, are the nonrecurring charges listed on this page supposed to be maximum nonrecurring charges or the actual nonrecurring charges that will be applied? For example, if the nonrecurring charges are maximum Service Connection Fees for Residential and Business, how are these nonrecurring charges different from the Service Connection Fees listed on Pages 62 and 64?

RESPONSE:

Please see the attached revised Page 64 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

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STF 1.16 Referencing the Arizona Tariff No. 2, Original Page 81, the Company cites the FCC's pay telephone compensation plan. The Company is proposing a maximum rate of \$1.00 and a current rate of \$.75 (Page 123 from the proposed Price List). Since it is the Commission Staff's recommended practice to not allow a rate over \$.60 for the public telephone surcharge, would the Company be willing to charge the same rate as listed in their federal tariff, add a sentence to this page (Page 81) indicating the Company will charge the same rate as it is listed in their federal tariff and remove all other rates for the Public Telephone Surcharge in this proposed tariff? If not, please explain in detail why not.

RESPONSE:

Please see the attached revised Page 81 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

SECTION 5.0 - MISCELLANEOUS SERVICES AND RATES, (CONT'D.)**5.5 Public Telephone Surcharge**

In order to recover the Company's expenses to comply with the FCC's pay telephone compensation plan effective on October 7, 1997 (FCC 97-371), an undiscountable per call charge is applicable to all intrastate calls that originate from any pay telephone, not presubscribed to the Company, used to access Company provided services. This surcharge, which is in addition to standard tariffed usage charges and any applicable service charges and surcharges associated with service, applies for the use of the instrument used to access Company provided service and is unrelated to the service accessed from the pay telephone.

Pay telephones include coin-operated and coinless phones owned by local telephone companies, independent companies and interexchange carriers. The Public Pay Telephone Surcharge applies to the initial completed call and any reoriginated call. The Public Pay Telephone Surcharge does not apply to calls placed from pay telephones at which the Customer pays for service by inserting coins during the progress of the call.

Whenever possible, the Public Pay Telephone Surcharge will appear on the same invoice containing the usage charges for the surcharged call. In cases where proper pay telephone coding digits are not transmitted to the Company prior to completion of a call, the Public Pay Telephone Surcharge may be billed on a subsequent invoice after the Company has obtained information from a carrier that the originating station is an eligible pay telephone.

Current Rate Per Call:	\$.75
Maximum Rate Per Call:	\$1.00

Issued: August 13, 2009

Issued by:

Leonard Solt
Treasurer
24814 State Road 54
Lutz, Florida 33549

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- STF 1.17 Referencing the Arizona Tariff No. 2, Original Page 85, subsection 5.7.1, the second paragraph states, "There are no call allowances for Directory Assistance." However, on Page 71, subsection 4.3.6.g and on Page 73, subsection 4.3.7.g, both Arizona Business Edition packages indicate "Customers selecting Directory Assistance may make six calls above the allowance to the Company's 411 service."
- A. Is there a Directory Assistance allowance?
 - B. If there are no Directory Assistance allowance, do the above provisions (4.3.6.g and 4.3.7.g) mean that each business line the customer subscribes to will receive six directory assistance calls per month included with their monthly service for those customers selecting the Directory Assistance feature? If not, please explain.

RESPONSE:

Please see the attached revised Page 85 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

SECTION 5.0 - MISCELLANEOUS SERVICES AND RATES, (CONT'D.)**5.7 Directory Assistance Services**

A Customer may obtain assistance, for a charge, in determining a telephone number by dialing Directory Assistance Service. A Customer can also receive assistance by writing the Company with a list of names and addresses for which telephone numbers are desired. A maximum of two requested telephone numbers are allowed per call

5.7.1 Basic Directory Assistance

The rates specified following apply when Customers request company assistance in determining telephone numbers of Customers who are located in the same local service area or who are not located in the same local service area but who are located within the same NPA.

Charges will not apply for calls placed from hospital services or calls placed from telephones where the Customer or, in the case of residence service, a member of the Customer's household, has been affirmed in writing as unable to use a Company provided directory because of a visual, physical or reading handicap.

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STF 1.18 Referencing the Arizona Tariff No. 2, Original Page 87, the third paragraph states, "A maximum of two(2) requested telephone numbers are allowed per call." Does this limit also apply to Basic Directory Assistance as well? If not, why not? If so, would the Company be willing to add this condition to Page 85 of their proposed tariff?

RESPONSE:

Please see the attached revised Page 85 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

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STF 1.19 Referencing the Arizona Tariff No. 2, Original Page 89, the first two sentences state, "The Company's operator services, available to presubscribed Customers, are accessible on a twenty-four(24) hour per day seven(7) days per week..

- A. Please explain what the term "presubscribed" means in the above context.
- B. Please explain what usage rates are referred to in the above context and where those rates are listed in the proposed tariff.
- C. If the Company is not providing Long Distance or Toll Services, how will non-local, intraLATA operator service calls be delivered?

RESPONSE:

- A. A Customer that orders telecommunications service form 321.
- B. No usage rates – See the attached revised Page 89.
- C. By the underlying carrier.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

SECTION 5.0 - MISCELLANEOUS SERVICES AND RATES, (CONT'D.)**5.8 Local Operator Service**

The Company's operator services, available to presubscribed Customers, are accessible on a twenty-four (24) hour per day seven (7) days per week basis. In addition to the per call service charge. The types of calls handled are as follows:

Customer Dialed Calling/Credit Card Call - This charge applies in addition to usage charges for station to station calls billed to an authorized Calling Card or Commercial Credit Card. The Customer must dial the destination telephone number where the capability exists for the Customer to do so. A separate rate applies in the event operator assistance is requested for entering the Customer's card number for billing purposes.

Operator Dialed Calling/Credit Card Call - This charge applies in addition to usage charges for station to station calls billed to an authorized telephone Calling Card or Commercial Credit Card and the operator dials the destination telephone number at the request of the Customer.

Operator Station - These charges apply in addition to usage charges for non-Person-to-Person calls placed using the assistance of a Company operator and billed Collect, to a Third Party, by deposit of coins in Pay Telephones, or via some method other than a Calling Card or Commercial Credit Card.

Person-to-Person - This charge applies in addition to usage charges for calls placed with the assistance of a Company operator to a particular party at the destination number. This charge applies regardless of billing method, including but not limited to billing to a Calling Card, Commercial Credit Card, Collect, by deposit of coins in Pay Telephones, or to a Third Party. Charges do not apply unless the specified party or an acceptable substitute is available.

Usage charges for local operator assisted calls are those usage charges that would normally apply to the calling party's service. In addition to usage charges, an operator assistance charge applies to each call.

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- STF 1.20 Referencing the Arizona Tariff No. 2, Original Page 107, subsection 7.2.1, paragraph four (4), the tariff states, "Regional Toll and Long Distance Services must be PIC'd to the Company." (underline added)
- A. Please explain in full and complete detail why a customer subscribing to 321's ISDN PRI Service "must" utilize 321's Regional Toll and Long Distance Services.
- B. Please explain in full and complete detail how this requirement doesn't violate the Commission's requirements for equal access.

RESPONSE:

Please see the attached revised Page 107.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

SECTION 7 – ADVANCED SERVICES**7.2 Advanced Service Packages****7.2.1 ISDN PRI Service with Unlimited Local Calling**

ISDN PRI offers an array of value-added features, such as calling number identification and call-by-call selection that enhance productivity. ISDN PRI is configured with 23 64 Kbps bi-directional B (Bearer) channels and one 64 Kbps D (Data) channel. Unique to ISDN PRI is its ability to designate the D channel to handle all of the signaling and call control requirements and leave the remaining 23 B channels free for any mix of circuit-switched voice and data.

Each of these products is offered under a 12, 24 or 36 month term agreement. Rates include unlimited local calling for sent-paid, directly dialed calls. Rates do not include calling card calls, information type calls to Time and Weather, 555, 700, 900, 976 Services, Directory Assistance or any other type of Operator Handled call.

ISDN PRI includes the following non-optional Feature Package: Inbound Calling Line ID-Name & Number and Call by Call Selection.

Recurring Charges

Monthly Recurring Charge			
12 Months	24 Months	36 Months	
\$650	\$600	\$550	

Non-Recurring Charges

Non-Recurring Charge			
	12 Months	24 Months	36 Months
First Line	\$500	\$250	\$250
Each Add'l Line	ICB	ICB	ICB
Expedite Service Charge ¹	Per PRI \$1,000		
Order Supplement Charge ²	First Change \$150	Subsequent Change \$150	
Order Cancellation Charge	Per PRI \$750		

¹ Expedite Service Charges apply when customer requests installation of service in less time than normal installation interval of 30 business days.

² Order Supplement Charges apply when a change of the Requested Service Date is requested by customer. A change of requested service date must be within 30 days of the previous requested service date. In no event will the Company be obligated to accept more than three (3) changes to a requested service date. The service will be deemed canceled upon the fourth (4) such request and applicable Order Cancellation Charges will apply.

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STF 1.21 Referencing the Arizona Tariff No. 2, Original Page 107, the Company is proposing to offer its ISDN PRI Service for rates based on an individual case basis ("ICB"). The Company is also not proposing maximum rates for this service. Since it is the Commission Staff's recommended practice to require a maximum rate for all ICB rates, please provide proposed maximum rates for the services listed on proposed Original Pages 107, 108, 109, 110, 111, and 112 and any other ICB rates proposed by the Company.

RESPONSE:

Please see the attached revised Pages 107, 108, 109, 110, 111, and 112.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

SECTION 7 – ADVANCED SERVICES**7.2 Advanced Service Packages, (Cont'd.)****7.2.2 Digital DS-1 PBX Service with Unlimited Local Calling**

This service provides a trunk side DS1 electrical interface from the customer's digital PBX system to a digital port on a local Company switch for the origination and termination of calls. Traffic to and from the digital PBX can be received or dialed directly from any PBX station without the need for an attendant.

These digital trunks deliver a high-speed DS1 (T1) connection between your PBX and the Company network. There are up to 24 channels on one facility, each of which can be used to place or receive calls. This multi-channel capability dramatically reduces the need for additional PBX circuit cards.

Each of these products is offered under a 12, 24 or 36 month term agreement. Rates include unlimited local calling for sent-paid, directly dialed calls. Rates do not include calling card calls, information type calls to Time and Weather, 555, 700, 900, 976 Services, Directory Assistance or any other type of Operator Handled call.

Monthly Recurring Charges

Monthly Recurring Charge			
12 Months	24 Months	36 Months	
\$650	\$600	\$550	

Non-Recurring Charges

Non-Recurring Charge			
	12 Months	24 Months	36 Months
First Line	\$500	\$250	\$250
Each Add'l Line	ICB	ICB	ICB
Expedite Service Charge ³	Per DS1 \$1,000		
Order Supplement Charge ⁴	First Change \$150	Subsequent Change \$150	
Order Cancellation Charge	Per DS1 \$750		

³ Expedite Service Charges apply when customer requests installation of service in less time than normal installation interval of 30 business days.

⁴ Order Supplement Charges apply when a change of the Requested Service Date is requested by customer. A change of requested service date must be within 30 days of the previous requested service date. In no event will the Company be obligated to accept more than three (3) changes to a requested service date. The service will be deemed canceled upon the fourth (4) such request and applicable Order Cancellation Charges will apply.

SECTION 7 – ADVANCED SERVICES**7.2 Advanced Service Packages, (Cont'd.)****7.2.3 ISDN PRI Service with Unlimited Local Calling**

ISDN PRI offers an array of value-added features, such as calling number identification and call-by-call selection that enhance productivity. ISDN PRI is configured with 23 64 Kbps bi-directional B (Bearer) channels and one 64 Kbps D (Data) channel. Unique to ISDN PRI is its ability to designate the D channel to handle all of the signaling and call control requirements and leave the remaining 23 B channels free for any mix of circuit-switched voice and data.

This product is offered under a 12, 24 or 36 month term agreement. Rates include unlimited local calling for sent-paid, directly dialed calls. Rates do not include calling card calls, information type calls to Time and Weather, 555, 700, 900, 976 Services, Directory Assistance or any other type of Operator Handled call.

The Unlimited Local Calling Products are offered with six different increments of Minutes of Use: 5,000, 10,000, 15,000, 30,000, 50,000 and 100,000. Installation charges are included in the monthly recurring charges.

ISDN PRI with Unlimited Local

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number & Call-by-Call Selection.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
\$850	\$800	\$750

ISDN PRI with Unlimited Local

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number & Call-by-Call Selection.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
\$1,000	\$950	\$900

SECTION 7 – ADVANCED SERVICES**7.2 Advanced Service Packages, (Cont'd.)****7.2.3 ISDN PRI Service with Unlimited Local Calling (Cont'd.)****ISDN PRI with Unlimited Local MOU**

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number & Call-by-Call Selection.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
\$1,200	\$1,150	\$1,100

Issued: August 13, 2009
Issued by:

Leonard Solt
Treasurer
24814 State Road 54
Lutz, Florida 33549

Effective: September 13, 2009

SECTION 7 – ADVANCED SERVICES**7.2 Advanced Service Packages, (Cont'd.)****7.2.4 Digital DS-1 PBX Service with Unlimited Local Calling Service**

This service provides a trunk side DS1 electrical interface from the customer's digital PBX system to a digital port on a local Company switch for the origination and termination of calls. Traffic to and from the digital PBX can be received or dialed directly from any PBX station without the need for an attendant.

These digital trunks deliver a high-speed DS1 (T1) connection between your PBX and the Company network. There are up to 24 channels on one facility, each of which can be used to place or receive calls. This multi-channel capability dramatically reduces the need for additional PBX circuit cards.

Each of these products is offered under a 12, 24 or 36 month term agreement. Rates include unlimited local calling for sent-paid, directly dialed calls. Rates do not include calling card calls, information type calls to Time and Weather, 555, 700, 900, 976 Services, Directory Assistance or any other type of Operator Handled call.

The Digital DS-1 PBX Service with Unlimited Local Calling Service Products are offered with six different increments of Minutes of Use: 5,000, 10,000, 15,000, 30,000, 50,000 and 100,000. Installation charges are included in the monthly recurring charges.

ISDN DS1 with Unlimited Local MOU

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
\$850	\$800	\$750

ISDN DS1 with Unlimited Local MOU

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
\$1,000	\$950	\$900

SECTION 7 – ADVANCED SERVICES**7.2 Advanced Service Packages, (Cont'd.)****7.2.4 Digital DS-1 PBX Service with Unlimited Local Calling and Bundled Toll/LD Service, (Cont'd.)**ISDN DS1 with Unlimited Local MOU

This package includes unlimited local minutes of use. Also included is Inbound Calling Line ID-Name & Number.

Monthly Recurring Charge		
12 Months	24 Months	36 Months
\$1,200	\$1,150	\$1,100

Issued: August 13, 2009
Issued by:

Leonard Solt
Treasurer
24814 State Road 54
Lutz, Florida 33549

Effective: September 13, 2009

**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.22 Referencing the Arizona Tariff No. 2, Original Pages 107 and 108, there is an error for a footnote marker at the bottom of each page next to the Order Cancellation Charge. Please correct each tariff sheet and remove the footnote and the bookmark not defined message from each page.

RESPONSE:

Please see the attached revised Page 107 and 108 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
24814 State Road 54, Lutz, FL 33549
E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
Telephone Number: 770-232-9200

**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.23 Referencing the Arizona Tariff No. 2, Original Page 107, under the list of nonrecurring charges, the Order Supplement Charge lists Verizon. Please explain the purpose of a company name is this place and please provide a corrected tariff sheet either removing a company name completely or replacing it with the appropriate company name for the charges (i.e. – Qwest).

RESPONSE:

Please see the attached revised Page 107 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

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E-Mail: lsolt@321communications.com
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And

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**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.24 Referencing the Arizona Tariff No. 2, Original Page 108, under the list of nonrecurring charges, the Order Supplement Charge lists SBC/Pacific Bell. Please explain the purpose of a company name is this place and please provide a corrected tariff sheet either removing a company name completely or replacing it with the appropriate company name for the charges (i.e. – Qwest).

RESPONSE:

Please see the attached revised Page 108 of Tariff No.2.

All Contacts Providing Information/Response for the above question:

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E-Mail: lsolt@321communications.com
Telephone Number: (813) 388-3157

And

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Alpharetta, Georgia 30005
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**ARIZONA CORPORATION COMMISSION
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321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.25 Referencing the Arizona Tariff No. 2, Original Pages 113 and 114, the Company is proposing only a current rate. Did the Company intend to propose maximum rates for its ISDN BRI and Digital Centrex Services?

RESPONSE:

No.

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**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
February 3, 2010**

STF 1.26 Please provide the telephone number, the location of the customer service call center and the number of employees that work at the call center that will provide assistance to Arizona customers.

RESPONSE:

Customer service telephone number: 866-575-7820
Location of call center: 24814 State Road 54, Lutz, FL 33549
Number of employees assisting Arizona customers: 788

All Contacts Providing Information/Response for the above question:

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E-Mail: lsolt@321communications.com
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Lance J.M. Steinhart, P.C.
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Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
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**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.27 Will 321 have any employees located in Arizona? If yes, please specify how many. If not, why not?

RESPONSE:

No. 321 is a Florida based corporation.

All Contacts Providing Information/Response for the above question:

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Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
E-mail: lsteinhart@telecomcounsel.com
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**ARIZONA CORPORATION COMMISSION
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321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.28 Will 321 have any investments and/or assets located in Arizona? If yes, please specify those investments and/or assets. If no, why not?

RESPONSE:

No. 321 is a Florida based corporation.

All Contacts Providing Information/Response for the above question:

Lenny Solt, President
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321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.29 How will 321 market their service in the Arizona market? Please provide any marketing material the Company will be using.

RESPONSE:

321 will not be marketing the product to end users. 321 is a whole sale provider that sells to retailers who market the product to its customers. 321 is not privy to its customer's marketing materials.

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321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.30 Will 321 be offering any services on a prepaid basis? If yes, please specify what those services are and how the prepayments will be handled by the Company.

RESPONSE:

No.

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**ARIZONA CORPORATION COMMISSION
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321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.31 Has the Company ever had any of its applications to provide service denied in any State? If so, please provide detailed information regarding the event(s).

RESPONSE:

No.

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321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.32 Has the Company ever had any of its authority to provide service revoked in any State? If so, please provide detailed information regarding the event(s).

RESPONSE:

No.

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**ARIZONA CORPORATION COMMISSION
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321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.33 Please explain how 321 calculated the rates that are contained in its tariff for each of service.

RESPONSE:

Actual rates are determined by cost of purchasing service from underlying carrier, minimum and maximum rates are determined by maximum possible rate decreases or increases.

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**ARIZONA CORPORATION COMMISSION
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321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.34 Please explain why 321 believes that its rates are just and reasonable using a fair value or cost basis. Please include economic justification or cost support data. Please include any and all supporting materials.

RESPONSE:

321 has no market power and the reasonableness of its rates will be evaluated in a market with numerous competitors.

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**ARIZONA CORPORATION COMMISSION
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321 COMMUNICATIONS, INC. ("321")
Docket No. T-20696A-09-0394
January 25, 2010**

STF 1.35 Please indicate why the Company believes that its rates are just and reasonable using a competitive market analysis. The analysis should contain publicly available examples of tariff rates and charges charged by the incumbent and other carriers for similar services. Include supporting material and any other information that the Company believes demonstrates that the proposed tariff rates and charges are just and reasonable.

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Docket No. T-20696A-09-0394
January 25, 2010**

Use a matrix format to list the Company's proposed services, rates, and charges (see attached Excel file). Based on the Company's tariff, list all of the telecommunications services the company will provide in Arizona. For each of the telecommunications services listed, provide the Company's tariff page numbers that support each of the company's services, rates, and charges. Also, provide the same information requested of the Company for Qwest and two other Arizona local exchange competitors using the same matrix format. List each competitor's services, rates, and charges for the same or comparable services and include copies of the tariff page of each service, rate and charge of each competitor. For a list of telecommunications carriers certified in Arizona, go to www.azcc.gov/divisions/utilities/utilitylist.asp. For a list of Commission-approved telecommunications rates and tariffs, go to www.azcc.gov/Divisions/Utilities/Tariff/util-tariffs-telecom.asp.

(Please Note: Refer to Attachments A and B for the prescribed format to submit the company's telecommunications services, rates, and charges and the telecommunications services, rates, and charges of its competitors. Please make sure to include all supporting tariff pages for each of the company's competitors.)

RESPONSE: 321 has no market power and the reasonableness of its rates will be evaluated in a market with numerous competitors.

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